



ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

RESPONSE: Tesla, Inc. is a publicly-owned company and: (1) there are no parent corporations and to its knowledge no publicly-held corporations owning ten percent (10%) or more of Tesla's stock; (2) Tesla, Inc. is not the parent of any publicly-owned company; and (3) Tesla, Inc. does not own ten percent (10%) or more of the outstanding shares on any publicly-owned company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civ. Rule 3.01 (D.S.C.).

RESPONSE: This matter should be assigned to the Florence Division as Plaintiff is a resident of Horry County, South Carolina.

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that *may* be related regardless of whether there are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by clerk of the court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: Upon information and belief, there are no related actions.

(F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Defendant is properly identified herein.

(G) [Defendants only.] If you content that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis for their liability.

RESPONSE: Defendant is not making this contention at this time.

Dated: Albany, New York  
April 8, 2021

ROSEWALDORF PLLC

By: s/ Jon. B. Waldorf  
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**CERTIFICATE OF SERVICE**

I hereby certify that these Responses to Local Rule 26.1 Interrogatories, filed through the ECF system on this date, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered.

Dated: Albany, New York  
April 8, 2021

s/ Jon B. Waldorf  
Jon B. Waldorf, Esq. (SC Bar No.: 76445)  
(District Court ID No.: 10668)

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